

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major–Draft Permit No. F-03-001 Revision 1

Western KY University

One Big Red Way

Bowling Green, Kentucky 42101

January 28, 2004

Esmail Hassanpour, Reviewer

Plant I.D. #: 21-227-00012

Application Log #: 55967

**SOURCE DESCRIPTION:**

A final Federally Enforceable permit, No. F-03-001, for Indirect Heat Exchangers and a Spray Booth was issued to Western KY University on June 6, 2003 and will expire on June 6, 2008. An application for a major revision to the permit F-03-001 was received on August 26, 2003 for the removal and addition of natural gas boilers used to heat buildings on campus. There are now a total of 59 natural gas boilers of various sizes on campus as compared with 43 natural gas boilers when the original permit application was submitted in 1996. There are fifty-one (51) boilers listed as significant emission units in the revised permit F-03-001 R1. Twenty (20) boilers have been removed and 36 boilers have been added. The applicant proposes to operate sixty-one (61) indirect heat exchangers. These heat exchangers consist of 2 coal-fired units (46.6 mmBtu/hr and 50.5 mmBtu/hr), and 59 natural gas fired units (6 with a combined rating of 18.96 mmBtu/hr, 2 unit each for 72.8 mmBtu/hr, 7 units with a combined rating of 22.15 mmBtu/hr, 33 units with combined rating of 72.77 mmBtu/hr, and 1 unit with a 20 mmBtu/hr rating), and 10<1 mmBtu/hr boilers. No changes have been made to the existing paint spray booth. The source has agreed to take federally enforceable limitations to preclude applicability of 401 KAR 52:020. The source will limit its annual tons of coal burned at Emission Points 01 and 02 to 5600 tons, and will set a source-wide cap of 750,000,000 cubic feet of natural gas burned in all its boilers.

**COMMENTS:**

Based on the information provided, the Division concluded that 401 KAR 61:015 applies to the existing boilers that were constructed before 1972 and 401 KAR 59:015 applies to the new boilers, which were constructed after 1972. 401 KAR 60:005, incorporating by reference 40 CFR 60, Subpart Dc also applies to emission unit 07, and 401 KAR 59:010 applies to the spray booth.

Emissions were calculated based on AP 42(7/98) are summarized in the air quality analysis and. Additional information used in making this review was obtained from existing agreed limitations records on file.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The source has also agreed to take federally enforceable limitations to preclude the applicability of 401 KAR 52:020. The source will limit its annual tons of coal burned at Emission Point 01 and 02 to 5600 tons, and will set a source-wide cap of 750,000,000 cubic feet of natural gas burned in all its boilers. Source-wide emissions from each regulated air pollutant shall not exceed 90 ton per each consecutive twelve (12) month period. Additional operating limitations are set out in Section D of the permit.

**OPERATIONAL FLEXIBILITY:** None

**CREDIBLE EVIDENCE:**

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.